

### **REMARKS**

Claims 7-28 are pending. Claims 7-28 have been added. Claims 1-6 have been cancelled. Applicants reserve the right to pursue the original and other claims in this and any other application.

The specification has been amended to correct two typographical errors. No new matter has been added.

The specification stands objected to because the Applicant failed to disclose Figure 1 and failed to disclose and describe Figure 7. The assignee of this application filed another U.S. Patent Application No. 10/660,751 ("the '751 application") on the same day as this application. Through inadvertence, the drawings of the '751 application were swapped with the drawings of this application. Applicants respectfully request that the drawings filed with the '751 application, copies of which are submitted herewith, be substituted for the drawings previously filed with this application. These replacement drawings correspond to the written description in the specification, as presently amended. Therefore, upon entry of the proper drawings, the objection to the drawings and the specification should be withdrawn.

Claims 1-6 stand rejected under 35 U.S.C. 102(e) as being anticipated by Sorokin et al. (U.S. Patent 6,522,325) ("Sorokin"). The rejection is moot because claims 1-6 have been cancelled. Applicants respectfully submit that new claims 7-28 are allowable over Sorokin for at least the reasons stated below.

Claim 7 recites a method for allowing users to virtually navigate a space. The method comprises, "generating a plurality of synthetic images corresponding to viewpoints along predefined paths through the space; selectively transmitting sequences of at least some of the synthetic images to the users, wherein the sequence transmitted to each user corresponds to a respective navigation request received from the user."

By contrast, Sorokin discloses an array of many closely-spaced cameras on rails. (Column 5, Lines 1-20 and FIG. 7a, Element 10) According to Sorokin, users “navigate through the array” by sequentially selecting adjacent camera images for display. (Column 6, Lines 24-29 and 39-43) For example, pressing a “left” button on a controller would display an image from a camera to the left of the current camera. Holding the “left” button down would cause the Sorokin system to display a succession of images, each from a camera to the left of the previous camera, thereby creating the illusion of a camera sliding to the left.

Applicants’ claimed invention, however, displays a sequence of images from *synthetic* viewpoints, i.e. viewpoints at which there is not a real camera. By displaying a sequence of synthetic images, the claimed invention is able to simulate navigation through a space without the need for an array of many closely-spaced cameras on rails, as disclosed by Sorokin. Because the claimed invention requires fewer cameras per volume of space, it can be expanded to permit navigation through larger spaces than would be possible according to Sorokin.

Moreover, by constraining the viewpoints to predefined paths, the total number of viewpoints within the space is reduced, making generation of a synthetic image from each viewpoint computationally feasible. By carefully selecting a path in response to a user navigation request and displaying a sequence of synthetic images from viewpoints along that path, the claimed invention provides an illusion of free movement within the space while actually constraining users to movement along the predefined paths. Sorokin does not teach or suggest “generating a plurality of synthetic images corresponding to viewpoints along predefined paths through the space [and] selectively transmitting sequences of at least some of the synthetic images to the users, wherein the sequence transmitted to each user corresponds to a respective navigation request received from the user,” or the efficiency and scalability gains derived therefrom. For at least these reasons, Applicants respectfully submit that claim 7 is allowable over Sorokin.

Independent claims 13 and 20 recite similar subject matter as claim 7 and are allowable over Sorokin for at least the reasons stated above with respect to claim 7 and on their own merits. Claims 8-12, 14-19, and 21-28 recite additional limitations also not disclosed or suggested by Sorokin and are also allowable along with the respective base claims and on their own merits.

In view of the above amendment, Applicants believe the pending application is in condition for allowance and respectfully requests that it be passed to issue.

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Respectfully submitted,

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